

AO 91 (Rev. 11/11) Criminal Complaint

FILED

UNITED STATES DISTRICT COURT

June 13, 2024

for the

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

Western District of Texas

BY: Myrna Gallegos
DEPUTY

United States of America)

v.)

Jaime Noe CEBALLOS Maturin)
Daniel SOBERANES Nunez)
)
)
)
)Case No. **EP-24-MJ-2394** -ATB

(1, 2)

Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

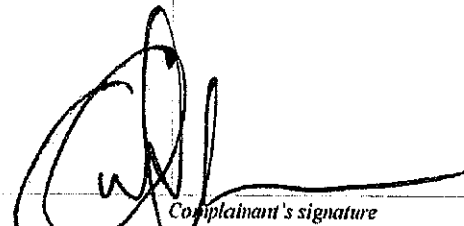
On or about the date(s) of June 11, 2024 - June 12, 2024 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 USC 554; 18 USC 371

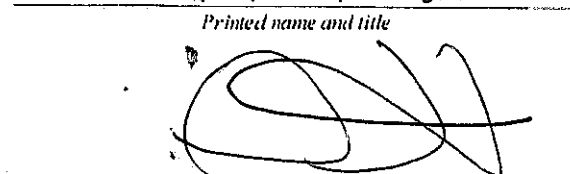
Whoever conspires to fraudulently or knowingly exports or sends from the United States, or attempts to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to-wit: approximately 2,820 rounds of ammunition.

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.
Complainant's signature
Antonio Vaquera - Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: 06/13/2024
Judge's signature
Anne T. Berton, U.S. Magistrate Judge
Printed name and titleCity and state: El Paso, TexasComplaint sworn to telephonically on
June 13, 2024 at 1:28 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**

AFFIDAVIT

On June 11, 2024, the El Paso Sector Border Patrol Anti-Smuggling Unit (ASU) received intelligence regarding suspected ammunition smuggling activities involving Jaime Noe CEBALLOS Maturin and Daniel SOBERANES Nunez. The information indicated that CEBALLOS and SOBERANES had purchased over 30 boxes of various calibers of ammunition and were observed entering a white Dodge Journey bearing a Durango, Mexico license plate FXK595D. ASU relayed this information to Homeland Security Investigations (HSI) El Paso Global Trade Group and Customs and Border Protection's Mobile Enforcement Team (MET) to facilitate an outbound inspection of the vehicle.

On the same day, at approximately 11:46 PM MST, MET encountered the aforementioned vehicle attempting to exit into Mexico via the Bridge of the Americas (BOTA) Port of Entry (POE). Customs and Border Protection Officers (CBPOs) identified Daniel SOBERANES Nunez as the driver of the white 2012 Dodge Journey, with passengers identified as Jaime Noe CEBALLOS Maturin, Karina Navar Sanchez, and Navar's five-month-old child. CBPO Peter Macias queried SOBERANES regarding any items to declare, including knives, firearms, ammunition, or currency exceeding \$10,000, to which SOBERANES replied in the negative. Subsequently, CBPOs escorted the driver and passengers to the secondary inspection area for further inspection.

At the secondary inspection area, CBPO Jose Juan Macias engaged with SOBERANES and Navar, inquiring about the purpose of their trip to the United States, to which SOBERANES stated they were shopping. Following SOBERANES's negative declaration regarding ammunition, firearms, and currency exceeding \$10,000, CBPO Juan Macias probed SOBERANES about any ammunition purchases in the United States, to which SOBERANES again denied. CBPO Juan Macias then informed SOBERANES of the officer's reason to believe he had purchased ammunition and concealment in the vehicle, leading to an exchange between SOBERANES and Navar. Navar proceeded to question SOBERANES. SOBERANES eventually requested a cigarette and expressed willingness to cooperate in exchange for assurance of Navar's release to Mexico, to which CBPO Juan Macias advised that he could arrange for her release to Mexico and advised SOBERANES that he could not provide any additional guarantees. SOBERANES then directed CBPO Juan Macias to inspect around the tires near the vehicle's frame before accompanying him and Navar to the headhouse for processing.

CBPO Juan Macias subsequently interviewed CEBALLOS, initially informing him of suspicions regarding ammunition purchase and concealment in the vehicle. Initially denying involvement, CEBALLOS later revealed the location of the concealed ammunition within the vehicle's wheel well.

A subsequent inspection of the vehicle revealed 40 boxes of various calibers of ammunition concealed inside the rocker panel, totaling 2820 rounds, comprising 1950 rounds of 9mm, 700 rounds of 38 Super, 150 rounds of 380, and 20 rounds of 30-30.

HSI Special Agent Antonio Vaquera arrived at the BOTA POE to investigate the seizure. SA Vaquera read Navar her Miranda Warnings in Spanish, witnessed by CBPO Christopher Macias. Navar waived her rights and provided a statement indicating her unawareness of SOBERANES's activities and the purchased ammunition.

AFFIDAVIT

SA Vaquera then read SOBERANES his Miranda Warnings in Spanish, witnessed by CBPO Christopher Macias. SOBERANES provided a statement detailing his trip to El Paso to sell goats and purchase clothing. SOBERANES also stating that CEBALLOS was authorized to purchase ammunition and requested SOBERANES to assist him with a purchase. SOBERANES, using Navar's credit card agreed to assist CEBALLOS. SOBERANES did not provide specifics on the packaging and storage of the ammunition in the vehicle.

SA Vaquera then read CEBALLOS his Miranda Warnings in Spanish, witnessed by CBPO Christopher Macias. SA Vaquera asked CEBALLOS to begin with what happened in the day in question. CEBALLOS responded with "it seemed so easy" (in Spanish). SA Vaquera asked for details of the days event. CEBALLOS then asked to speak to a lawyer before answering any additional questions.

Border search examination of CEBALLOS cellular telephone revealed his involvement in straw purchasing of firearms across the United States and trafficking of firearms into Mexico.

The international crossing history of the white Dodge Journey over the past six months identified SOBERANES and Navar as the primary occupants of the vehicle.

End of Affidavit.